

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
Plaintiff)
v.)
LOI VAN NGUYEN)
Defendant)

CASE NO. 04-10086-RCL

MA 04-10086-RCL

UNITED STATES DISTRICT COURT
DISTRICT OF MASS

**MOTION FOR AN ORDER FOR
PREPARATION OF PRE-PLEA PRE-SENTENCE REPORT**

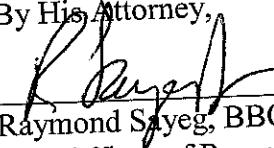
NOW COMES the Defendant, Loi Nguyen, by and through undersigned Counsel, and respectfully requests an order of this Honorable Court authorizing the United States Probation Office to prepare a Pre-Plea Pre-Sentence Report. As reasons therefore, the Defendant states as follows:

1. The Defendant has entered into a Plea Agreement with the government, dated March 23, 2004.
2. Pursuant to the Pre-Plea Agreement and the status of the law, it is likely that the Defendant will face a period of incarceration as a result of the change of plea in this matter.
3. Pursuant to Rule 32(e) (1), the Defendant specifically consents in writing for the Probation Officer to prepare and submit a Pre-Sentence Report to the parties and to the Court prior to the proposed change of plea.
4. The Defendant agrees that the time should be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(8).

5. Counsel for the government, Assistant United States Attorney Laura J. Kaplan, assents to within Motion.

WHEREFORE, the Defendant respectfully requests this Honorable Court allow the within Motion.

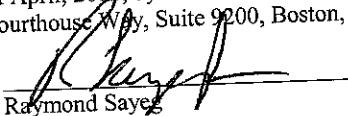
Respectfully submitted
LOI VAN NGUYEN
By His Attorney,


Raymond Sayeg, BBO #555437
Law Offices of Raymond Sayeg
Four Longfellow Place, 35th Floor
Boston, MA 02114
(617) 742-1184

Dated: April 1, 2004

CERTIFICATE OF SERVICE

I, Raymond Sayeg, hereby certify that a true and exact copy of the foregoing Motion For An Order For Preparation of Pre-Plea Pre-Sentence Report was served this 1st day of April, 2004, by hand-delivery upon United States District Attorney, Laura J. Kaplan, U.S. Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, MA 02210.


Raymond Sayeg